1	Geoffrey M. Drake KING & SPALDING LLP		
2	1180 Peachtree Street NE, Suite 1600 Atlanta, GA 30309-3521		
3	Telephone: (404) 572-4600 Facsimile: (404) 572-5100		
4	gdrake@kslaw.com		
5	Andrea Roberts Pierson		
6	FAEGRE DRINKER LLP 300 N. Meridian Street, Suite 2500		
7	Indianapolis, IN 46204 Telephone: (317) 237-0300		
8	Facsimile: (317) 237-1000		
9	andrea.pierson@faegredrinker.com		
10	Attorneys for TikTok Inc. and ByteDance Inc.		
11			
12	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
13			
14	IN RE: SOCIAL MEDIA ADOLESCENT	Case No. 4:22-MD-03047-YGR	
15	ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION	MDL No. 3047	
16			
17	This Document Relates to:	DEFENDANTS TIKTOK INC. AND BYTEDANCE INC.'S, ADMINISTRATIVE MOTION TO SEAL DOCUMENTS	
18	ALL ACTIONS	MOTION TO SELLE DOCUMENTS	
19			
20	Pursuant to Civil Local Rule 79-5(b) and this Court's Case Management Order No. 3		
21	(ECF 111), Defendants TikTok Inc. and ByteDance Inc. (collectively, "TikTok") have filed under		
22	seal the Civil Investigative Demands ("CIDs") received to date in the state attorneys general		
23	investigations Plaintiffs identified in footnote 9 to the parties' Case Management Statement (ECF		
24	No. 96): (1) "Texas Investigation into TikTok for alleged violations of children's privacy and		
25	facilitation of human trafficking"; and (2) "Attorneys General Investigation into TikTok's effects		
26	on kids' health." The Court expressly authorized the filing of these non-public documents in		
27	Case Management Order No. 3 at 5:14-15, and therefore pursuant to Civil Local Rule 79-5(b),		
28	TikTok is not required to file a motion to seal.	TikTok is submitting the sealed documents for the	

1	Court's review via this administrative motion out of an abundance of caution. Further, TikTok	
2	understood from the Court's statements at the December 14, 2022 case management conference,	
3	that TikTok was not required to provide unsealed versions of the non-public documents to	
4	Plaintiffs at this stage. Accordingly, TikTok has not provided the unsealed versions of the non-	
5	public documents to Plaintiffs.	
6	DATED: December 19, 2022	FAEGRE DRINKER LLP
7		By:/s/ Andrea Roberts Pierson
8		Andrea Roberts Pierson 300 N. Meridian Street, Suite 2500
9		Indianapolis, IN 46204 Telephone: + 1 (317) 237-0300
10		Facsimile: +1 (317) 237-1000 Email: andrea.pierson@faegredrinker.com
11		
12		KING & SPALDING LLP
13		By: /s/ Geoffrey M. Drake Geoffrey M. Drake
14		1180 Peachtree Street, NE, Suite 1600 Atlanta, GA 30309
15		Telephone: + 1 (404) 572-4600 Facsimile: + 1 (404) 572-5100
16		Email: gdrake@kslaw.com
17		Attorneys for Defendants TikTok Inc. and ByteDance Inc.
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		